

BRUCE A. BLAKEMAN
County Executive



THOMAS A. ADAMS
Acting County Attorney

**COUNTY OF NASSAU
OFFICE OF THE COUNTY ATTORNEY**

February 18, 2022

Via ECF

Hon. James M. Wicks
United States District Court
100 Federal Plaza
Central Islip, New York 11722

Re: *Henry v. County of Nassau, et al.*,
Case No. 17-CV-6545 (DRH)(AKT) (E.D.N.Y.) and
Fusco v. County of Nassau, et al.,
Case No. 19-CV-04771 (DRH)(JMW) (E.D.N.Y.)

Dear Magistrate Judge Wicks:

This office represents defendants, in the above-referenced actions. In response to Law Clerk Tracy J. Weinstein's request of even date that defendants inform the Court of the County's position as to the outstanding discovery issues in the *Henry* and *Fusco* matters, defendants state as follows.

I have had a meet and confer with plaintiff's counsel, Robert J. La Reddola, Esq. As the result of our meet and confer, the County has agreed to produce on behalf of the County a new document production responsive to plaintiffs' requests for documents in electronic form and without redactions. We have agreed to limit the range of document production from March 2010 to date. The County will produce documents as Bates numbered and organized in response to plaintiff's document demands.

The County is respectfully requesting ninety (90) days to accomplish this. Mr. La Reddola has indicated that, subject to the approval of the Court to extend our deposition dates, this is acceptable to plaintiff.

Thank you for your attention and consideration in this matter.

Respectfully submitted,

/s/ Ralph J. Reissman
RALPH J. REISSMAN

cc: (Via ECF) Robert La Reddola, Attorney for Plaintiff